

October 12, 2010

Mr. Kurt V. Berchtold
Executive Officer
Santa Ana Regional Water Quality Control Board
3737 Main Street, Suite 500
Riverside, CA 92501

VIA E-MAIL: KBERCHTOLD@WATERBOARDS.CA.GOV

Subject: October 29, 2010 Santa Ana Regional Water Quality Control Board Agenda Item No. 7 re: *Amendment to Urban State Water Runoff Permit No. R8-2009-0030* for Orange County and the Incorporated Cities

Dear Mr. Berchtold:

We are informed that your Board will consider extending the timeline for the preparation and approval of the Model Water Quality Management Plan (MWQMP) for the County of Orange and Incorporated Cities on October 29, 2010.

The Orange County Business Council (OCBC) supports this revised timeline.

Given the magnitude of the MS4 Permit's direction to determine the feasibility, scope and economic effects of low impact development, careful consideration of the MWQMP and Technical Guidance Document (TGD) is critical. Specifically, we believe that the extension will allow for a few important benefits to the existing draft Program:

- The draft documents can be simplified, providing more concise guidance for cities and the development industry alike;
- The County of Orange will be able to coordinate more closely with the Counties of Riverside and San Bernardino on regional consistency issues; and
- The economic impacts of the proposed program can be further examined to ensure the Program is consistent with State law requiring consideration of the same.

The Orange County Business Council is on the cutting edge of issues and solutions for the business community that affects Orange County's economic growth and strength. As such, OCBC remains committed to investing in water quality as a top priority in the County of Orange and appreciates the opportunity to comment on this important agenda item.

Sincerely,



Kate Klimow
Vice President, Government Affairs